

ORIGINAL
 SCANNED 3/5/04
 DATE: 3/5/04
 BY: JHE

IN THE UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF GEORGIA
 ATLANTA DIVISION

FILED IN CLERK'S OFFICE
 U.S. DISTRICT COURT
 ATLANTA

DEC 16 2003

LUTHER D. THOMAS, Clerk
 By: JMK
 Deputy Clerk

**RICHARD H. GILMORE, On behalf
 Of Himself and All Others Similarly
 Situated,** :

Plaintiff, :

vs. :

**CIVIL ACTION
 FILE NO. 03-CV-3223 TWT**

**CITIGROUP, INC., SMITH BARNEY
 INC., SALOMON SMITH BARNEY
 INC., SALOMON BROTHER, INC.,
 CITIFINANCIAL INC. and
 TRAVELERS GROUP INC.,** :

Defendants. :

**NOTICE OF FILING OF
 TAG-ALONG ACTION NOTICE**

Defendants Citigroup Inc., Smith Barney Inc., Salomon Smith Barney Inc., Salomon Brothers Inc., Citifinancial Inc. and Travelers Group Inc. (collectively, "Defendants"), through their undersigned attorneys, hereby file this Notice of Filing of Tag-Along Action Notice with the Judicial Panel on Multidistrict Litigation.

1. On November 6, 2003, Defendants filed a Notice of Tag-Along Action with the Judicial Panel on Multidistrict Litigation pursuant to Rule 7.5(e) of the Rules

of Procedure of the Judicial Panel on Multidistrict Litigation. A copy of the Notice without exhibits is attached hereto as Exhibit 1.

2. By Order dated August 29, 2000, the Panel transferred for coordination or consolidation all related pending cases in In re Citigroup, Inc., Capital Accumulation Plan Litigation, MDL Docket No. 1354 (the "Transferred Actions"), to the United States District Court for the District of Massachusetts before the Honorable Judge Robert E. Keeton (the "Transfer Order"). The Transfer Order is attached hereto as Exhibit 2.

3. On October 22, 2003, this "tag-along" or related action was filed in the United States District Court for the Northern District of Georgia (Docket No. 03-CV-3223(TWT)) (the "Georgia Action"). The Georgia Action is a "tag-along" action within the meaning of Rule 1.1 of the Rules of Procedure of the Judicial Panel on Multidistrict Litigation as it involves common questions of fact with the Transferred Actions.

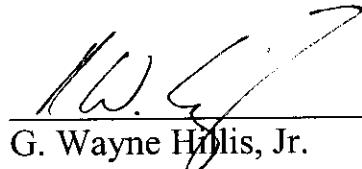
4. In light of the foregoing, Defendants have filed the Notice requesting that the Judicial Panel on Multidistrict Litigation enter an Order transferring the Georgia Action to the District of Massachusetts, the Transferee Court, in accordance with the prior Transfer Order of the Panel in this matter.

This 6th day of December, 2003.

Respectfully submitted,

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By:


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